

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ZTE (USA) Inc.,
Samsung Electronics Co., Ltd., and
Samsung Electronics America, Inc.,

Petitioner

v.

Fundamental Innovation Systems International LLC,

Patent Owner

DECLARATION OF JAMES T. GEIER

Case No. IPR2018-00276

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I. Introduction

1. My name is James T. Geier. I submit this declaration on behalf of ZTE (USA) Inc., Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc. (“Petitioner”), which I understand are challenging the validity of claims 1-3, 6-8, 12, and 14-18 (“the challenged claims”) of U.S. Patent No. 7,239,111 B2 (“the 111 patent”) in a petition for inter partes review.

2. I have been asked to provide an opinion on the validity of the challenged claims. In my opinion, claims 1-3, 6-8, 12, and 14-18 of the 111 patent are obvious based on the following grounds:

- Ground 1: U.S. Patent No. 5,925,942 (“Theobald”) and U.S. Patent No. 6,625,738 (“Shiga”) render obvious claims 1-3, 6-8, and 16-18 of the ’111 patent.
- Ground 2: Theobald, Shiga, and U.S. Patent No. 6,049,192 (“Kfoury”) render obvious claim 15 of the ’111 patent.
- Ground 3: U.S. Patent No. 7,360,004 (“Dougherty”), U.S. Patent No. 5,973,948 (“Hahn”), and U.S. Patent No. 5,884,086 (“Amoni”) render obvious claims 12 and 14 of the ’111 patent.

II. Background/Qualifications

3. Appendix A to this declaration is my curriculum vitae, which sets forth my qualifications.

4. I received a B.S. degree in Electrical Engineering from California State University in 1985. In 1990, I received an M.S. degree in Electrical Engineering from the Air Force Institute of Technology.

5. I have 30 years' experience in the communications industry designing, analyzing, and implementing communications systems, wireless networks, and mobile devices. I have authored over a dozen books on mobile and wireless topics, including *Designing and Deploying 802.11 Wireless Networks* (Cisco Press), *Implementing 802.1X Security Solutions* (Wiley), *Wireless Networking Handbook* (New Riders) and *Network Re-engineering* (McGraw-Hill). I have been an active participant within standards organizations, such as the IEEE 802.11 Working Group and the Wi-Fi Alliance. I have served as Chairman of the IEEE Computer Society, Dayton Section, and various conferences.

6. I have significant experience with USB, which includes reviewing and analyzing USB specifications and designing and integrating corresponding USB interfaces within various applications. Since 1998, I have been analyzing the operation and limitations of USB in relation to mobile devices that I have designed. For example, during 1998-1999, I analyzed and tested the integration of USB into Monarch Marking Systems bar code scanners and printers. Also, during 2008-2009, I integrated USB into a microcontroller-based monitoring and control system, which involved writing software drivers to interface the microcontroller to

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